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NEW UNITED MOTOR MANUFACTURING INC. DISABILITY INSURANCE INCOME
PLAN and LIFE INSURANCE COMPANY OF NORTH AMERICA

UNITED STATES DISTRICT COURT

IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

ELIZABETH GALLOWAY,

Plaintiff,

v.

NEW UNITED MOTOR MANUFACTURING
INC. DISABILITY INSURANCE INCOME
PLAN,

Defendant.

LIFE INSURANCE COMPANY OF NORTH
AMERICA,

Real Party in Interest

) Case No. C 05-03787 CRB

)
) **STIPULATION FOR ENTRY OF**
) **JUDGMENT AND ~~PROPOSED~~**
) **ORDER**

Elizabeth Galloway ("Plaintiff") and Defendants New United Motor Manufacturing Inc. Disability Insurance Income Plan ("Plan") and Life Insurance Company Of North America ("LINA") (collectively "Defendants") have reached a settlement of this matter. The parties request that the Court enter judgment that this litigation has been settled and terminated subject to the terms of the Confidential Settlement Agreement and General Release ("Agreement"), to be filed with this Court under seal to ensure confidentiality. The parties request that the Court enter judgment enforcing the terms of the Agreement.

DATED: April 28, 2006

LAW OFFICES OF LAURENCE F. PADWAY

/S/ LAURENCE F. PADWAY

By _____
Laurence F. Padway
Attorneys for Plaintiff
ELIZABETH GALLOWAY

DATED: April 28, 2006

SEYFARTH SHAW LLP

/S/ CAROLYN A. KNOX

By _____
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NEW UNITED MOTOR
MANUFACTURING INC. DISABILITY
INSURANCE INCOME PLAN and LIFE
INSURANCE COMPANY OF NORTH
AMERICA

JUDGMENT BY THE COURT

On stipulation of the parties, the Court enters the Confidential Settlement Agreement and General Release of Claims, to be filed with this Court under seal, as its judgment in the within action. The Court shall enforce the terms of the Confidential Settlement Agreement and General Release.

DATED: _____ May 01 _____, 2006

HON. CHARLES R. BREYER
UNITED STATES DISTRICT COURT

